

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR

4:23-cr-40057

Plaintiff,

REDACTED INDICTMENT

v.

Conspiracy to Commit Wire Fraud
18 U.S.C. §§ 1343 and 1349

EVAN FREDERICK LIGHT,

Defendant.

Conspiracy to Launder Monetary
Instruments
18 U.S.C. §§ 1956(a)(1)(B)(i)
and 1956(h)

Forfeiture Allegations

The Grand Jury charges:

Count 1

Conspiracy to Commit Wire Fraud – 18 U.S.C. §§ 1343 and 1349

Beginning at a time unknown, but no later than on or about August 2021 and continuing through the date of this Indictment, in the District of South Dakota and elsewhere, the Defendant, Evan Frederick Light, did conspire and agree with others known and unknown to the Grand Jury, to commit the offense of wire fraud, in violation of 18 U.S.C. §§ 1343 and 1349. Defendant, with others known and unknown to the Grand Jury, willfully and unlawfully devised and intended to devise a scheme and artifice to defraud and to obtain money and property from others by means of false and fraudulent pretenses, representations, and promises, and having devised the scheme and artifice to defraud, caused communications to be sent between South Dakota and

elsewhere, and did knowingly use and cause communications to be transmitted in interstate and foreign commerce, by means of a wire communication, writings, signs, signals, and sounds, for the purpose of executing such scheme and artifice. Defendant's acts and omissions were in violation of 18 U.S.C. §§ 1343 and 1349.

Count 2

**Conspiracy to Launder Monetary Instruments –
18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h)**

The allegation in Count 1 of this Indictment is hereby realleged and incorporated by reference.

Beginning at a time unknown, but no later than on or about August 2021 and continuing through the date of this Indictment, in the District of South Dakota and elsewhere, the Defendant, Evan Frederick Light, did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, to wit: depositing, transferring, wiring, purchasing, and withdrawing virtual currencies and electronic payments, which involved the proceeds of a specified unlawful activity, that is, wire fraud, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, Defendant knew that the property involved in the financial transactions represented the

proceeds of some form of unlawful activity, all in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h).

Forfeiture Allegation Relating to Count 1

The allegations in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(c), and 28 U.S.C. § 2461(c).

Pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c), upon conviction of the offense set forth in Count 1 of this Indictment, Defendant Evan Frederick Light shall forfeit to the United States, any property, real or personal, which constitutes or is derived from proceeds traceable to such violations.

If any of the property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Forfeiture Allegation Relating to Count 2

The allegations contained in Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures

pursuant to 18 U.S.C. § 982(a)(1).

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of an offense in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h) as alleged in Count 2 of this Indictment, Defendant Evan Frederick Light shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

If any of the property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

Name Redacted

Foreperson

ALISON J. RAMSDELL
United States Attorney

By:  _____